REMARKS

Claims 1 and 10-14 are pending. Claims 2-9 have been cancelled without prejudice or disclaimer.

No new subject matter has been added to the specification or claims.

Claims 1-6 and 9 were rejected under 35 U.S.C. §102(b) over U.S. Patent no. 4,680,645 to Dispoto et al. Claims 7 and 8 were rejected under 35 U.S.C. §103 in view of Dispoto. These rejections are respectfully traversed in view of the amendments to the claims and the following arguments.

Independent claim 1 is amended to focus on error diffusion implementation. Support for the amended claim 1 is found in the original application, for instance, see Figure 2; page 6 lines 7-15; page 6 line 28 to page 7 line 18; and page 9 line 27 to page 10 line 12.

The term "state" in the amended claim 1 is a generalization of:

- "a pixel value" such as pixel intensity or density (see original claim 6); or
- "a reproducible output value" (page 6, lines 7-8); or
- of "a set of colors" corresponding to "the Cartesian product" of "values for the individual inks" (page 9, lines 27 to page 10 line 4).

In order to sustain a §102 rejection, each and every feature of the claims must be taught by the reference. Amended claim 1 clearly differentiates the invention from Dispoto by stating that the quantization of a modified input pixel is influenced by the value of the unmodified input pixel. In Dispoto the quantization of the modified input pixel is only influenced by the value of

the modified input pixel. Since Dispoto does not teach every feature of claim 1, then the §102 rejection is traversed.

In determining a prima facie case for obviousness under 35 U.S.C. §103, it is necessary to show that the combination of prior art teachings is proper, and that those teachings are sufficient to suggest making the claimed modifications to one of ordinary skill in the art. Since there is *no suggestion or motivation* in Dispoto to quantize a modified input pixel that is influenced by a value of an unmodified input pixel, then combining Dispoto with another reference is inappropriate. Hence the §103 rejection is overcome.

Furthermore, amended claim 1 is also inventive because it solves the technical problem in the prior art of avoiding sparse pixels having an intensity that is too low in high intensity parts or too high in low intensity regions of a halftoned image (page 5 lines 31-37).

The prior art made of record and not relied upon has been reviewed but is not considered material to the patentability of the invention.

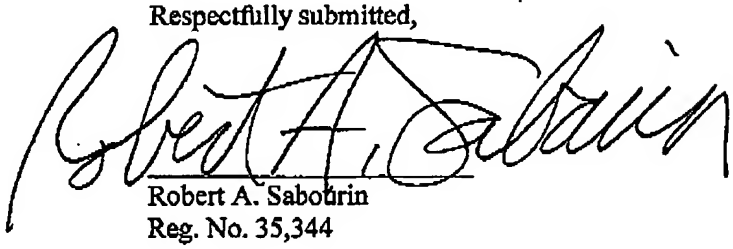
No fees are believed to be due with this response. However, if an error has been made in the fee calculations, please charge any fees due under this general authorization to Deposit Account No. 13-3377.

It should be noted that the above arguments are directed towards certain patentable distinctions between the claims and the prior art cited. However, the patentable distinctions between the pending claims and the prior art cited are not necessarily limited to those discussed above.

GN01025 PATENT

In view of the foregoing remarks and amendments, it is respectfully submitted that each rejection of the Office Action has been addressed and overcome so that this application is now in condition for allowance. The Examiner is respectfully requested to reconsider the application, withdraw the rejections and/or objections, and pass the application to issue. Should questions arise during examination, the Examiner is welcome to contact the applicant's attorney as listed below.

Respectfully submitted,



Robert A. Sabourin
Reg. No. 35,344

Agfa Corporation
Law & Patent Department
200 Ballardvale Street
Wilmington, MA. 01887-1069

Tel: 978-284-5604

RAS/pc